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13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 BRYANT LECHUGA,

16 Plaintiff,

17 vs.

18 RAMPARTS, LLC, a Nevada Limited Liability
19 Company; DOES I-X; and ROE Business
20 Entities I-X,

21 Defendants.

22 Case No. 2:19-cv-01731-APG-BNW

23 **STIPULATION AND ORDER TO STAY
24 ACTION UNTIL MAY 22, 2020**

25 (ECF No. 24)

26 IT IS HEREBY STIPULATED by and between Plaintiff Bryan Lechuga (“Plaintiff”),
27 through his counsel Kemp & Kemp, and Defendant Ramparts, LLC (“Defendant”), through its
28 counsel Jackson Lewis P.C., that this action be stayed in its entirety for 60 days, until May 22,
2020, with this Court’s approval. This Stipulation is submitted and based upon the following:

1. Due to the public health and safety issues caused by COVID-19, the Parties
anticipate significant delays in the discovery process. Defendant has temporarily ceased all
business operations for health and safety reasons, and will continue to do so in accordance with the
directive of Governor Steve Sisolak. During this time, the Parties will be unable to participate
meaningfully in discovery.

2. Due to these circumstances, the Parties agree it is appropriate that this matter be
stayed in its entirety for a period of 60 days, until May 22, 2020.

1 3. On or before May 29, 2020, the Parties will submit a Stipulation and Order to
2 Amend the Scheduling Order (ECF No. 21) to establish new deadlines.

3 4. Should circumstances change such that a shorter or a longer stay is appropriate, the
4 Parties will immediately and jointly notify the Court.

5 5. This request is made in good faith and not for the purpose of delay.

6 Dated this 23rd day of March, 2020.

7 KEMP & KEMP

JACKSON LEWIS P.C.

9 */s/ James P. Kemp*
10 James P. Kemp, Bar # 6375
10 7435 W. Azure Drive, Suite 110
10 Las Vegas, NV 89130

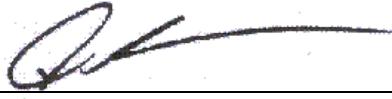
11 *Attorneys for Plaintiff*
12 *Bryant Lechuga*

9 */s/ Joshua A. Sliker*
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11 *Attorneys for Defendant*
12 *Ramparts, LLC*

14 **ORDER**

16 IT IS SO ORDERED:



18 UNITED STATES DISTRICT JUDGE

19 Dated: May 5, 2020.

23 4824-7170-8088, v. 1